



## **GDPR DATA PRIVACY NOTICE FOR WWW.E-STRANDS.COM**

This is privacy notice of E-Strands Ltd.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below.

Version 1.0: This policy was last updated on 23th May 2018 in line with GDPR requirements. It may be updated in the future and we'll post the new version here on our website. We will never deviate from our overall philosophy of maintaining your privacy, though.

### **1. WHO WE ARE AND IMPORTANT INFORMATION**

E-Strands Limited ("we", "us", "our") take security and privacy seriously. This Privacy Policy explains how we collect, store and use personal data when you browse [www.e-strands.com](http://www.e-strands.com) (the "E-Strands website"), or otherwise provide your personal data to us. Please read this Privacy Policy carefully to understand how we will treat your personal data.

This Privacy Policy should be read together with our Terms of Service, which together apply to your use of the E-Strands website and our services.

### **2. THE PERSONAL DATA WE COLLECT ABOUT YOU**

#### **Your personal data**

When we say your "personal data", we mean any information that identifies any person, that you provide to us during normal business engagement through but not exclusive to online forms, networking, letters, telephone conversations and emails.

Your "personal data" may also be contained in information that we collect about you in connection with your use of the website. When it comes to your personal data, we comply with our obligations under the General Data Protection Regulation and any other applicable data protection legislation.

Information you provide – Your personal data includes the information you provide, or that you authorise someone else to provide, sign up to receive our emails, or when you answer questionnaires, surveys, enter competitions or provide information in your profile, on the E-Strands website, or during a support enquiry about you and/or your organisation. It also includes information you provide when you complete any forms which you submit to us e.g. to contact us for support. It also includes information you upload to your website.

Examples of this personal data include your name, your email address, contact and/or employee names; and any correspondence when you contact us. It could also include your bank account details and bank transaction details (if it identifies a person). It could also include details in any invoices or receipts that you upload (if they identify a person).



We do not collect or process special categories of personal data, as defined under GDPR. Also, we do not knowingly collect or solicit any personal data from anyone under the age of sixteen or knowingly allow such persons to register for a website. E-Strands Ltd is not directed at children under the age of sixteen. If we learn that we have collected personal data from a child under age sixteen without verification of parental consent, we will delete that information as quickly as possible.

**Information we collect** - We collect information about your website usage, to improve our service and to understand trends to enhance and customise content and advertisements. Some of this data may be "personal data", where it identifies a person. Here's the information that we collect and how we use it:

We monitor patterns of usage, such as login dates and volumes of data, so we can understand how people are using the website to develop and improve our products and provide support information.

We reserve the right to monitor patterns of usage so that we can tailor any communications we may send you or advertising you may receive. For example, we may tailor your newsletter with information about product features that you haven't tried yet, instead of features that you use frequently.

We monitor traffic information when you visit our site or read our emails, including things like page visits, email clicks, purchases, referring sites, and video viewings. We use this information to improve our website, advertising, promotions, and to understand customer purchasing behaviour. Please see Section 4: Use of Cookies below regarding Cookies.

**Information Others Provide to Us** - We may receive information from others that you have authorised that third party to provide to us.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We use different methods to collect data from and about you including through:

Website forms, networking, business referral's and general B2B routes

**Directly.** You may give us your identity, contact information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for our products or services;
- Create an account on our website;
- Subscribe to our service or publications;
- Request marketing to be sent to you.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing [info@e-strands.com](mailto:info@e-strands.com).

**Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by unsubscribing or contacting us Michael Janes email: [info@e-strands.com](mailto:info@e-strands.com). However, we encourage normal business referral options. We actively network within the business community and encourage businesses to Keep Trade Local.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [info@e-strands.com](mailto:info@e-strands.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To offer networking with potential customers	(a) Identity (b) Contact	Legitimate Interest



## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you are networking, and, in each case, you have not opted out of receiving that marketing. You have the right to unsubscribe at any time and our systems allow for double opt in to receive any further marketing.

## **Third-party marketing**

We never sell on or share your personal data with any company outside E-Strands Ltd for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [info@e-strands.com](mailto:info@e-strands.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product or service experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [HTTP://WWW.E-STRANDS.COM/COOKIES](http://www.e-strands.com/cookies)

## **About cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.



Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### **Cookies that we use.**

We use cookies for the following purposes: We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

### **Cookies used by our service providers**

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website and how we might improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

### **Business Catalyst Cookies**

We use Business Catalyst Analytics to analyse the use of our website. Business Catalyst Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website and how we might improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. Business Catalyst privacy policy is available at:

This link below outlines all cookies used on Business Catalyst sites.

The cookies used can be categorized as follows:

Required - These cookies are necessary for site functionality and cannot be disabled

Performance and tracking - These cookies can be disabled

<https://docs.worldsecuresystems.com/reference/misc/bc-cookies.html>

### **Managing cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:



- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Michael Janes email [info@e-strands.com](mailto:info@e-strands.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We will not sell your data to a third party. However, we will share your personal data with third parties in certain circumstances:

We may disclose your data to any member of our network family (which means our contacts that may want your services or if we believe that there is a possibility that you can both mutually benefit from knowing each other. In General, we class this as referral business opportunities and other companies which may be added to our group from time to time;

We may also share your personal and financial data with third parties:

In the event that we, our business, or substantially all of its assets are acquired by a third party (in which case personal information about customers will be one of the transferred assets);

If we are under a duty to disclose or share your personal or financial data in order to comply with any legal obligation; to cooperate with law enforcement officials in the investigation of unlawful activities of website users; or in order to enforce or apply any contract with you; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In choosing to work with any such third parties, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we ourselves impose and expect, as a minimum. No ownership rights to the data will be transferred to any third party.

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties EG Sub contractors for services such as printing
- External Third Parties Service
  - Providers acting as processors who provide it and system administration services EG Adobe.
  - Professional advisers acting as processors including lawyers, bankers, auditors who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). For example, cloud storage companies such as Dropbox. It may also be processed by subcontractors operating outside the EEA who work in partnership with us, eg Adobe support team or for one of our suppliers. Such staff maybe engaged in, among other things, the processing of your support request and the provision of support services. By submitting your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

For a full list of subprocessors and details of the adequate safeguards in place in respect of data transfers outside the EEA, please see here.

Useful LINKS:

<https://www.adobe.com/privacy/general-data-protection-regulation.html>

<https://encryption.eset.com/gb/gdpr-compliance/>

[ICO's Guide to the GDPR](#)

[ICO: Getting ready for the GDPR](#)

[Blog: data protection and privacy](#)

[Blog: The latest on subject access requests](#)

[Data protection register: notify ICO about personal data](#)

[Data Protection - 12 action points for SMEs to prepare for GDPR](#)

[Information Commissioner's Office](#)

[Data protection for SMEs](#)

[Small businesses: Do you know when you need to register with the ICO?](#)

[6 steps to handling personal data](#)

[Big data for small business](#)

[Beware and prepare](#)

## **7. DATA SECURITY**

We take security and privacy seriously. We will endeavour to take all reasonable steps to keep your personal and financial data secure once it has been transferred to our systems. We adopt appropriate, industry standard data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction. For further details of the some of the security measures we have implemented, please see here.

Where we utilise third parties to help provide our services, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we ourselves impose and expect, as a minimum.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the E-Strands websites you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Please note that the internet is not a secure medium and although we will do our best to protect your data, we cannot guarantee the security of any data itself. Any transmission is at your own risk.

## **8. DATA RETENTION**

We only store your data for as long as necessary for the purposes of processing set out in this policy. When you cancel your website, you can either delete your data immediately, or we will automatically delete your data within 60 days.

If you are signed up to marketing communications, cancelling your subscription with in the email will cancel your email marketing immediately. If you would like to unsubscribe please click on the link within the email or email [info@e-strands.com](mailto:info@e-strands.com).



To ensure the integrity of our systems and your data, we utilise various technologies to continually take secure, encrypted backups. Data remains archived within these backups and these are maintained according to our defined two-year data retention policy, after which they are removed.

You have the option to delete all your data at any time, using the "Delete website" option with in Business Catalyst. You can use this option before cancelling a website. After you delete your data, we may not immediately delete residual copies from Amazon active servers and may not remove information from our backup systems. Generally, we will retain your website data and personal data for a reasonable period, or for as long as the law requires.

We highly recommend that you export your data before cancelling, since many countries (including the UK) require you retain your business records going back many years, even if you have finished trading.

If your website expires, your account is not automatically cancelled within our systems. We will retain historical details about your payments to E-Strands and Adobe for accounting purposes because we need to do so by law.

### **We don't store your credit card details**

Once your website closes, you will be required to provide payment details to start your subscription and continue using your website. This information is passed directly to our payment service provider PayPal/Adobe over an encrypted link and is never stored on our systems. We handle ongoing billing by passing a token to PayPal/Adobe that identifies your account.

Please see here <https://www.adobe.com/privacy/general-data-protection-regulation.html> for details of Adobe privacy policy.

## **9. YOUR LEGAL RIGHTS**

**Access to your personal data:** You can ask us to confirm if we are processing your personal data and you may request a copy of your personal data by contacting our support team at [info@e-strands.com](mailto:info@e-strands.com).

*Right to change or withdraw your consent:* Where you have given us consent to make use of your personal data for any of the purposes outlined in this policy, you may withdraw that consent by contacting us using the details located at section 11 of this policy. If you wish to change your contact preferences or no longer wish to be contacted for marketing purposes or get in touch via email.

*Right to Rectification:* You may ask us to update out of date or inaccurate information we hold about you. To do so get in touch via email or our contact form.

*Right to Erasure:* In certain circumstances you may ask us to erase your Personal Data. If you would like us to erase the personal data we hold about you, please get in touch, specifying why you would like us to do so.

*Right to Data Portability:* In certain circumstances you may ask us to provide you with the personal data that we hold about you in a structured, commonly used, machine readable form, or ask for us to



send such personal data to another data controller. To do so get in touch via email or our contact form.

*Right to object:* In certain circumstances you may object to our processing of your personal data. Please get in touch via email or our contact form

*Right to restrict processing:* You can ask us to restrict the processing of personal data we hold about you in certain circumstances. To do so get in touch via email or our contact form.

*Make a complaint:* You may make a complaint about our data processing activities to a supervisory authority. In the UK this is the Information Commissioner's Office (ICO). Further details can be found on their website at <https://ico.org.uk>.

Getting in touch: To make enquiries and/or to exercise any of your rights in this privacy policy please contact our support team at [info@e-strands.com](mailto:info@e-strands.com).

#### **No fee required – with some exceptions**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last updated' header at the top of this page.

This Privacy Policy was last amended on 23th May 2018.



## 11. QUERIES, REQUESTS OR CONCERNS

If you have any queries relating to this Privacy Policy or E-Strands use of your personal or financial data, please contact our Data Controller via email through [info@e-strands.com](mailto:info@e-strands.com), or by writing to us at E-Strands Ltd C/O Acklam Hall, Hall Drive, Acklam, Middlesbrough TS5 7DY

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact Michael Janes our data protection officer on 01642 688710.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.